

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE KINGREY, and SANDRA McCOLLUM, individually and as heirs at law to the Estate of LARRY GENE McCOLLUM, PLAINTIFFS

V.

BRAD LIVINGSTON, JEFF PRINGLE, §  
RICHARD CLARK, KAREN TATE, §  
SANDREA SANDERS, ROBERT EASON, the §  
UNIVERSITY OF TEXAS MEDICAL §  
BRANCH and the TEXAS DEPARTMENT OF §  
CRIMINAL JUSTICE. §  
DEFENDANTS §

CIVIL ACTION NO.  
3:12-cv-02037  
JURY DEMAND

**PLAINTIFFS' UNOPPOSED MOTION TO FILE  
SECOND AMENDED COMPLAINT**

Plaintiffs, STEPHEN McCOLLUM, STEPHANIE KINGREY, and SANDRA McCOLLUM, individually and as heirs at law to the Estate of LARRY GENE McCOLLUM file this Motion for Leave to File Their Second Amended Complaint and would show the Court as follows:

Discovery in this case is ongoing. As Plaintiffs have conducted discovery, they have learned additional relevant facts they now wish to add to their complaint. Accordingly, Plaintiffs seek leave to amend to add factual detail.

Plaintiffs have contacted Counsel for Defendants and they are not opposed to this motion.

As leave to amend should be freely given pursuant to Rule 15, Plaintiffs ask the Court to grant Plaintiffs' motion for leave to file their Second Amended Complaint,

which is attached as Exhibit A to this motion.

Respectfully submitted,

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By \_\_\_\_\_/s/ Jeff Edwards

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF CONFERENCE**

Plaintiffs have contacted Counsel for defendants. None are opposed to this motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of January 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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